1 0 SEP 1959

MEMORANDUM FOR: Executive Assistant to the Deputy Director

(Support)

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CLASS

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SUBJECT

: Revison of R

TRAINING AT NON-CIA

FACILITIES UNDER THE GOVERNMENT EMPLOYEES

TRAINING ACT

(Job No. 1213)

REFERENCE

: Your memorandum of 27 August 1959, subject as

above

1. Our comments regarding the three unresolved items affecting the subject regulation and the proposals made with regard to these items are as follows:

6. The changes suggested by the Office of Training to provide for DDP's cover responsibilities are helpful but not entirely adequate. They should be supplemented or modified as indicated below:

(1) Add a subparagraph under paragraph 2 to read:

"Whose attendance will not endanger sensitive limison, operations or cover with which the individual has previously been associated."

(2) Modify paragraph 3.e.(1) to read:

"Provide for cover as required and approve all cover aspects of the external training program."

(3) Add in a paragraph on procedures a provision for all requests for approval of external training to be routed through the Chief, Central Cover Division.

b. Our position on the inclusion of procedures in regulations has been stated a number of times. It is entirely reasonable and consistent with the aim of keeping regulations reasonably brief. We agree that lengthy and detailed procedures should be published in handbook form. Procedures should not be excluded from regulations,

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however, simply because they are procedures. If a procedure is not sufficiently long to warrant separate handbook treatment, and cannot be combined with related procedures in a handbook, yet is of general concern and application, we believe that it should be made part of the pertinent regulation. With specific regard to not proposing paragraph after paragraph of procedures. We believe, however, that basic procedural guidance would be helpful to those requesting approval of external training, and should be in the regulation. This would include at least the form to be used and any special routing requirements. One such requirement is that all requests should be routed through the Chief, Central Cover Division (see paragraph 1.a.(3) above). They should reach CCD after consideration by the Operating Official and the Career Service, but before reference to Security and finally OTR. This would not necessarily be accomplished by reliance on the statements of policy and responsibilities. Provision should also be made for coordination with CCD following initial selection of personnel to attend senior officer colleges so that any pertinent recommendations from the cover standpoint may be made before final selection.

- . The proposed new paragraph 2.b. is satisfactory.
- 2. With the changes indicated above, this office concurs in the 7 May 1959 draft of the subject revision.

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Chief, Operational Services